

**Westside Resource Conservation District**

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There are potentially significant impacts to prime agricultural land and agricultural water supplies identified in several places in the June, 1999 PEIS/R. These significant impacts are recognised in several of the common program elements including the Ecosystem Restoration Program, the Levee System Integrity Program, and the Water Quality Program. In reviewing the PEIS/R it is apparent that alternative approaches to these program elements have never been considered or analyzed by CALFED so as to avoid, reduce, or minimize potential impacts to agricultural resources. It is our view that the purpose of a programmatic environmental impact report under CEQA is to provide exactly that type of analysis. Therefore, we must conclude that the PEIS/R is inadequate in fulfilling CEQA requirements.

Furthermore, we find the approach towards mitigation of impacts to agricultural land and water resources in the PEIS/R to be lacking for the purposes of CEQA. The purpose of a PEIS/R under CEQA is to present policy and assurances as to how mitigation of impacts will in fact be implemented. The PEIS/R does present some policy statements that recognize agricultural resources as valuable and that impacts will be appropriately mitigated. However, a full discussion of mitigated strategies and a definition of appropriate mitigation are lacking in the document.

We are hopeful that a full discussion of these issues will be incorporated in the final CALFED PEIS/R and the Preferred Alternative. Thank you for the opportunity to comment.

Sincerely,

Morris A. Martin, Manager